

COURTESY COPY

WILMERHALE

January 12, 2015

Charles C. Platt

VIA ECF

+1 212 230 8860 (t)

+1 212 230 8888 (f)

charles.platt@wilmerhale.com

The Honorable John G. Koeltl  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *SLS Capital, S.A. v. HSBC Bank USA, N.A.*, No. 14-cv-6846 (JGK)

Dear Judge Koeltl:

In accordance with Rule 1.E of this Court's Individual Practices, Defendant HSBC Bank USA, N.A. ("HSBC") respectfully submits this letter-motion requesting permission to respond to the complaint of Plaintiff SLS Capital S.A. ("SLS") on March 23, 2015, sixty days after the current deadline of January 20, 2015 imposed by Federal Rule of Civil Procedure 12(a)(1)(A)(ii).

HSBC requests additional time due to the complex issues introduced by the complaint, which includes eleven causes of action and asserts issues of foreign law. HSBC has conferred with SLS, and SLS consents to this request. This is the first request for an extension by HSBC, and it affects no other scheduled dates for this litigation.

Respectfully submitted,

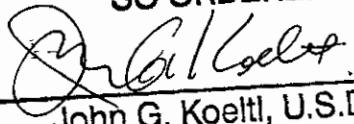
/s/ Charles C. Platt

Charles C. Platt

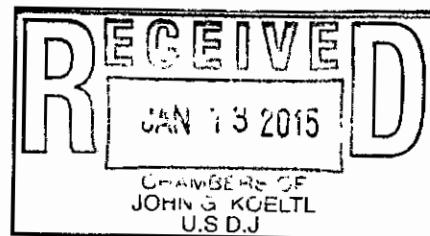
cc: All Counsel (by ECF)

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC#  
DATE FILED 1-13-15

APPLICATION GRANTED  
SO ORDERED

  
John G. Koeltl, U.S.D.J.

1/13/15



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SOURCE COPY

----- X -----  
SLS CAPITAL, S.A. (IN LIQUIDATION), )  
Plaintiff, ) Case No. 14-6846 (JGK)  
- v. - ) **RULE 7.1 DISCLOSURE**  
**STATEMENT**  
HSBC BANK USA, N.A., )  
Defendant. )  
----- X -----

Pursuant to Fed. R. Civ. P. 7.1, Defendant HSBC Bank USA, N.A. submits this disclosure statement identifying any parent corporation and any publicly held corporation that owns 10 percent or more of its stock.

1. HSBC Bank USA, N.A. is a wholly owned subsidiary of HSBC USA Inc., which is indirectly owned by HSBC Holdings plc, a United Kingdom Corporation.
2. The shares of HSBC Holdings plc are traded on certain foreign stock exchanges and are traded over the counter in the United States as sponsored American depository receipts.

Dated: January 12, 2015  
New York, New York

By: /s/ Charles C. Platt  
Charles C. Platt  
David Zetlin-Jones  
Joseph J. Yu  
WILMER CUTLER PICKERING HALE AND DORR LLP  
7 World Trade Center  
250 Greenwich Street  
New York, NY 10007  
Tel.: (212) 230-8800  
Fax: (212) 230-8888

*Counsel for HSBC Bank USA, N.A.*